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ROGERS AND JONATHAN ROGERS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ALBERT RICHARDS,

Plaintiff,

v.

CENTRIPETAL NETWORKS, LLC f/k/a
CENTRIPETAL NETWORKS, INC.;
STEVEN ROGERS; JONATHAN
ROGERS; and JOHN DOES 1-10,

Defendants.

Case No. 4:23-cv-00145-HSG

**STIPULATION TO EXTEND DEADLINE TO
FILE DISCOVERY MOTION; ORDER**

Local Civ. R. 6-1, 6-2, 7-12

Judge: Hon. Haywood S. Gilliam, Jr.

Pursuant to Civil Local Rules 6-1, 6-2 and 7-12, the Parties hereby stipulate to and request that the Court extend the current deadline for Plaintiff Albert Richards (“Plaintiff”) to move to compel further responses and/or production of documents in response to discovery requests served on Defendant Centripetal Networks, LLC (“Defendant”).

RECITALS

WHEREAS, on May 14, 2024, Plaintiff served his first set of requests for production and first set of interrogatories on Defendant (the “Requests”);

WHEREAS, under Local Rule 37-3, “no discovery-related motions may be filed more than seven days after the discovery cut-off”;

WHEREAS, the discovery cutoff in this matter passed on July 22, 2024;

WHEREAS, therefore, the deadline to move to compel discovery on the Requests is seven days after that date, on July 29, 2024;

WHEREAS, counsel for Plaintiff sent a meet and confer letter concerning the Requests on July 9, 2024, to which counsel for Defendant responded on July 19, 2024;

WHEREAS, counsel for the Parties conferred via telephone on July 25, 2024;

WHEREAS, the Parties believe there continues to be potential for agreement on outstanding discovery disputes;

WHEREAS, the Parties mutually believe that allowing further time for meet-and-confer discussions may yield agreement without the need for judicial intervention, which would prevent undue costs and preserve judicial resources;

WHEREAS, Plaintiff has not as yet produced any documents in response to Defendants’ First Set of Requests for Production of Documents, served on May 10, 2024;

WHEREAS, the Parties agree that in the event that they cannot timely resolve any issues concerning such production, when made, Plaintiff will not oppose the filing of an appropriate Administrative Motion to Extend Time to File Discovery Motion;

WHEREAS, the Court has not previously granted any continuances of this nature, and the requested relief will not unduly impact the Court’s case schedule; and

1 WHEREAS, Defendant does not oppose Plaintiff's Administrative Motion to Extend Time to
2 File Discovery Motion, filed herewith;

3 THEREFORE, the Parties, through their counsel, hereby stipulate and agree to request that
4 the Court extend the deadline for Plaintiff to bring a discovery motion with regard to the Requests,
5 to August 12, 2024, to facilitate ongoing meet and confer efforts.

6 **IT IS SO STIPULATED.**

7
8 Dated: July 26, 2024

LEWIS & LLEWELLYN LLP

9 By: */s/ Kenneth M. Walczak*

10
11 Marc R. Lewis
12 Kenneth M. Walczak
13 Peter C. Squeri
14 Daniel Jordan

15 Attorneys for Plaintiff
16 ALBERT RICHARDS

17
18 Dated: July 26, 2024

KRAMER LEVIN NAFTALIS & FRANKEL
LLP

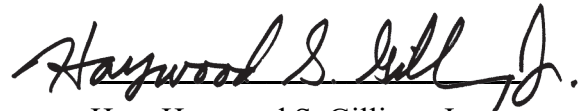
19 By: */s/ Jonathan M. Wagner*

20 Jonathan M. Wagner

21 Attorney for Defendants
22 CENTRIPETAL NETWORKS, LLC,
JONATHAN ROGERS, and STEVEN ROGERS

23 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.** The last day for
24 Plaintiff to file a discovery motion in connection with the Requests shall be August 12, 2024.

25
26 Date: 7/26/2024

27 
28 Hon. Haywood S. Gilliam, Jr.
United States District Judge